

## **REMARKS/ARGUMENTS**

Reconsideration and withdrawal of the rejections of the application are respectfully requested in view of the amendments and remarks herewith, which place the application into condition for allowance. The present amendment is being made to facilitate prosecution of the application.

### **I. STATUS OF THE CLAIMS AND FORMAL MATTERS**

Claims 1-10, which are pending in this application, are hereby amended. Claims 1 and 6 are independent. Support for this amendment is provided throughout the specification. No new matter has been introduced by this amendment. It is submitted that these claims, as originally presented, were in full compliance with the requirements of 35 U.S.C. §112. Changes to these claims, as presented herein, are not made for the purpose of patentability within the meaning of 35 U.S.C. §101, §102, §103, or §112. Rather, these changes are made simply for clarification and to round out the scope of protection to which Applicant is entitled.

### **II. REJECTIONS UNDER 35 U.S.C. §103(a)**

Claims 1-10 were rejected under 35 U.S.C. §103(a) as allegedly unpatentable over U.S. Patent No. 5,278,838 to Ng, et al. in view of U.S. Patent No. 5,758,057 to Baba, et al.

Claim 1 recites, *inter alia*:

“...a plurality of RAID for recording and/or reproducing data containing video and/or audio data, each RAID having a plurality of HDD and a LAN interface;

an error-correcting RAID for recording and reproducing an error-correcting code, having a plurality of HDD and said LAN interface; and

a plurality of input and output processing means connected to said plurality of RAID and said error-correcting RAID through said LAN for processing said data inputted from the outside to output processed data to said RAID in a time-division manner and which process said data outputted from said RAID in a time-division manner to output processed data to the outside,

wherein said plurality of input and output processing means further includes: input processing means for dividing said data inputted from the outside to transfer divided data to said RAID, for generating an error-correcting code of said data, and for transferring said error-correcting code to said error-correcting RAID; and output processing means for correcting erroneous data by using said error-correcting code outputted from said error-correcting RAID, and for outputting error-corrected data to the outside if an error is detected from said data outputted from said RAID,

wherein said error is detected based on status data, which includes a status of said data and said error-correcting code, that is returned from said RAID to one of the plurality of input and output processing means, and is then added to an error table that includes information regarding an error in the recording and/or reproducing of said data and error-correcting code.” (emphasis added)

As understood by Applicant U.S. Patent No. 5,278,838 to Ng, et al. (hereinafter, merely “Ng”) relates to rebuilding data of an array to remove the degradation of fault tolerance in a redundant array of disk drives due to error conditions.

As understood by Applicant, U.S. Patent No. 5,758,057 to Baba, et al. (hereinafter, merely “Baba”) relates to the generation and transmission of data stored in a faulty disk drive when one of a plurality of disk drives is faulty due to an internal calibration error or an

error of the disk drive, or when the faulty disk drive does not respond within a predetermined length of time set in a timeout table.

Applicant respectfully submits that nothing has been found in Ng or Baba, taken alone or in combination, that would teach or suggest the above-identified features of independent claim 1.

Specifically, Applicant submits that Ng and Baba fail to disclose or suggest a plurality of RAID for recording and/or reproducing data containing video and/or audio data, each RAID having a plurality of HDD and a LAN interface, an error-correcting RAID for recording and reproducing an error-correcting code, having a plurality of HDD and said LAN interface, and a plurality of input and output processing means connected to said plurality of RAID and said error-correcting RAID through said LAN for processing said data inputted from the outside to output processed data to said RAID in a time-division manner and which process said data outputted from said RAID in a time-division manner to output processed data to the outside, wherein said plurality of input and output processing means further includes input processing means for dividing said data inputted from the outside to transfer divided data to said RAID, for generating an error-correcting code of said data, and for transferring said error-correcting code to said error-correcting RAID and output processing means for correcting erroneous data by using said error-correcting code outputted from said error-correcting RAID, and for outputting error-corrected data to the outside if an error is detected from said data outputted from said RAID, wherein said error is detected based on status data, which includes a status of said data and said error-correcting code, that is returned from said RAID to one of the plurality of input and output processing means, and is then added to an error table that includes information regarding an error in the recording and/or reproducing of said data and error-correcting code, as recited in claim 1.

Therefore, claim 1 is patentable.

For reason similar to those described above, claim 6 is also believed to be patentable.

### **III. DEPENDENT CLAIMS**

The other claims in this application are each dependent from one of the independent claims discussed above and are therefore believed patentable for at least the same reasons. Since each dependent claim is also deemed to define an additional aspect of the invention, however, the individual reconsideration of the patentability of each on its own merits is respectfully requested.

### **CONCLUSION**

In the event the Examiner disagrees with any of statements appearing above with respect to the disclosure in the cited reference, or references, it is respectfully requested that the Examiner specifically indicate those portions of the reference, or references, providing the basis for a contrary view.

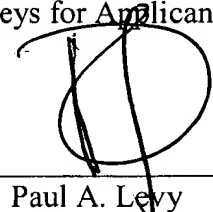
In view of the foregoing amendments and remarks, it is believed that all of the claims in this application are patentable and Applicant respectfully requests early passage to issue of the present application.

Please charge any additional fees that may be needed, and credit any  
overpayment, to our Deposit Account No. 50-0320.

Respectfully submitted,

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